

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN CIVIL LIBERTIES UNION,)	
et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 98-CV-5591
)	
ERIC H. HOLDER, in his official)	
capacity as ATTORNEY GENERAL)	
OF THE UNITED STATES,)	
)	
Defendant.)	

JOINT MOTION TO EXTEND TIME

Plaintiffs American Civil Liberties Union *et al.* and Defendant Eric H. Holder hereby jointly move this Court for additional time in which to file Plaintiffs' renewed motion for costs, fees, and expenses pursuant to 28 U.S.C. § 2412.

The instant motion arises out of the dispute between the parties regarding Plaintiffs' claims for costs, fees and expenses pursuant to 28 U.S.C. § 2412.

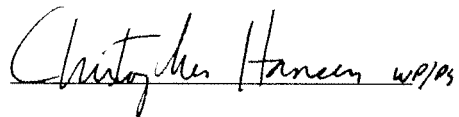
On June 30, 2009, this Court entered an Order providing, *inter alia*, that Plaintiffs submit their motion for fees, costs and expenses by September 1, 2009.

Since that time, the parties have continued to negotiate and are making significant progress in settlement talks. To allow time for the settlement process to continue, the parties jointly request that this Court extend the schedule set out in this Court's June 30, 2009 Order such that:

- 1) Plaintiffs' renewed motion for costs, fees and expenses shall be filed by October 1, 2009;
- 2) Defendant's response in opposition shall be filed by December 1, 2009; and
- 3) Plaintiffs' reply shall be filed by January 4, 2010.

Dated: August 31, 2009

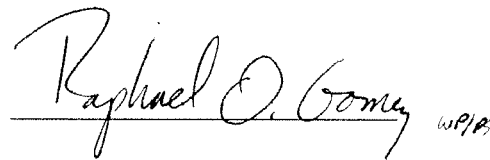
AMERICAN CIVIL LIBERTIES UNION

Handwritten signature of Christopher Hansen in cursive, with the initials "wp/rs" written to the right of the signature.

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U.S. DEPARTMENT OF JUSTICE

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